

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 25 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KENNETH EDWARDS,

Defendant.

4:16CR372 RLW/DDN

INDICTMENT

COUNTS I through III – WIRE FRAUD

Introduction

1. At all relevant times, Defendant Kenneth Edwards was a resident of the City of St. Louis, Missouri.
2. At all relevant times, Wal-Mart and Sam's Club are retail stores operating in the Eastern District of Missouri.
3. At all relevant times, the Telecheck is a check acceptance system whereby checks and securities presented for payment at retail stores are quickly reviewed for authenticity and, if approved, payment information is transmitted to financial institutions associated with a particular check or security used for payment. A Telecheck review involves the transmission of wire communications to servers and data centers located in the State of Arizona or the State of Nebraska.

The Scheme

4. The scheme existed from at least August 7, 2015 and December 22, 2015 (the "relevant time period").
5. It was the object of the scheme for Defendant to present checks and securities using the account number, routing number and other information of an individual, R.B., to

purchase valuable goods from retail stores using forged or counterfeit checks and securities.

6. It was a part of the scheme that Defendant obtained a checkbook, identification, and other information of R.B. after it was stolen from R.B. in the Eastern District of Missouri on or about August 7, 2015.
7. It was a further part of the scheme that Defendant either forged authentic checks of R.B. or created counterfeit checks using personally identifiable information of R.B. including her name, bank account number, bank routing number and other information.
8. It was a further part of the scheme that, Defendant presented forged or counterfeit checks using the aforementioned information associated with R.B. and successfully presented them at a Wal-Mart and a Sam's Club all within the Eastern District of Missouri.
9. It was a further part of the scheme that, because the checks or securities were presented with bank information that correctly corresponded to R.B., they were accepted for payment at the retail stores after a TeleCheck inquiry and payment from R.B.'s financial account was directed to the stores via TeleCheck. These activities involved interstate wire communications between retail stores, servers, data centers and financial institutions and such communications were foreseeable to Defendant.

Offense Conduct

10. Between on or about August 7, 2015 and December 22, 2015, in the Eastern District of Missouri and elsewhere, in furtherance and execution of the foregoing fraud scheme,

KENNETH EDWARDS,

having devised a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of

wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

Count	Date	Amount	Store
I	December 18, 2015	\$1,442.51	Wal-Mart
II	December 19, 2015	\$1,091.75	Sam's Club
III	December 22, 2015	\$1,585.00	Sam's Club

All in violation of Title 18, United States Code Section 1343.

COUNT IV – AGGRAVATED IDENTITY THEFT

11. The Allegations contained in paragraphs 1 through 10 are re-alleged and incorporated herein by reference.
12. Between on or about December 18, 2015 and continuing until on or about December 22, 2015, in furtherance and in relation to the offense of Wire Fraud as alleged above in Counts I through III, the Defendant,

KENNETH EDWARDS,

without lawful authority, knowingly used, possessed and transferred a means of identification of R.B.

In violation of Title 18, United States Code, Section 1028(a).

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Thomas C. Albus, #96250
Assistant United States Attorney